

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MELISSA TIERNEY, individually and on  
behalf of other persons similarly situated who  
were employed,

Plaintiffs,

- against -

SIRIUS XM RADIO, INC., and/or any other  
entities affiliated with or controlled by SIRIUS  
XM RADIO, INC.,

Defendants.

**Case No. 14-cv-2926 (VEC)**

**DECLARATION OF JENNIFER MOFFETT**

I, Jennifer Moffett, declare as follows:

1. My name is Jennifer Moffett. I am a resident of Brooklyn, New York. I am over the age of 18 and am otherwise competent to make this declaration.

2. All the statements in this declaration are true and accurate. The facts in this declaration are based on my own personal knowledge.

3. I was an intern for Sirius XM Radio Inc. from approximately September to December 2012.

4. I was an intern in the Sirius Talent Relations Department.

5. I was enrolled at the University of Connecticut and received academic credit for participating in Sirius' intern program. I understood that the internship was unpaid and that I was required to receive academic credit to participate.

6. My mentor was Liam Davenport, who is a Senior Manager in Talent Relations.

7. During my internship, I gained valuable experience and knowledge by shadowing and observing the Talent Representatives, who are the employees in the Talent Relations Department. I also learned by helping them do their jobs.

8. For example, under the supervision of the Talent Representatives, I helped make sure that guests signed releases and arrived at the correct studios on time and I also helped organize and file the signed releases. I also helped to make sure that guests felt comfortable and had everything they needed before their show started.

9. Oftentimes I was allowed to watch the interviews of guests.

10. After the guests were finished with their appearance, I assisted the Talent Representatives with ushering the guest to be photographed and then escorted out.

11. There was almost always at least one Talent Representative with me.

12. I learned many valuable skills as an intern at Sirius. I learned how to multitask, organize scheduling, how to interact with people in various roles, and I learned about professionalism and interactions in a business environment. I also built up a network of contacts and having Sirius on my resume was quite valuable.

13. Everyone in the Talent Relations Department was very patient in answering my questions, willing to give me feedback, and talk to me about their career progressions. Many people allowed me to look over their shoulder and learn how to book guests and build relationships. Mentors were always present while I was working and reviewed everything I did to make sure I did it correctly.

14. I attended at least one resume building workshop while I was an intern and it was quite helpful.

15. I also sat in on Talent Department meetings, which are weekly, hour-long meetings where the employees in the Talent Department get caught up on what the other members of the group are doing.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 21, 2014

  
Jennifer Moffett

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